

ANNIE L. MZYK *pro se*

W

No. SA-14-CA-0952-HLH

Defendant and Counter-Plaintiff

TO THE HONORABLE HARRY LEE HUDSPETH, SENIOR U. S. DISTRICT JUDGE:

Plaintiff/Counter-Defendant Annie L. Mzyk, *pro se*, files this answer to the Defendant/Counter-Plaintiff North East Independent School District's Counter Claim suit. On March 19, 2015, a copy was received of the **Defendant's Original Answer, Affirmative Defense, and Counter-Claim**; Document 6 filed March 10, 2015 and postmarked March 17, 2015

I. ANSWER

1. Plaintiff/Counter-Defendant Annie L. Mzyk, *pro se* affirmatively denies filing a suit that is frivolous, unreasonable, and without foundation in violation of Texas Education Code § 11.161.

2. The Complaint No. SA-14-CA-0952 was filed in Federal Court on October 29, 2014 **based on the instructions** in the U.S. Equal Employment Opportunity Commission's (EEOC) Right to Sue Letter dated July 30, 2014. This EEOC letter

was mailed July 31, 2014, and received by Plaintiff on August 1, 2014.

This EEOC Right to Sue letter is attached at the end of the Court recommended EEOC Complaint Form used to file SA-14-CA-0952 as required by item 10. Also attached is the required EEOC Charge of Discrimination No. 451-2013- 2545 dated July 22, 2013, plus amendment #1 dated January 3, 2014 and amendment #2 dated June 20, 2014. All three charges detail Retaliation, Age, and Disability Discriminations which occurred from September 25, 2012 and continuing. The frequent discrimination and retaliation events occurred while Plaintiff was receiving extensive disability treatments in 2012, 2013, and 2014 for the **life threatening illnesses** of Leukemia, Aplastic Anemia, and Diabetes.

3. The filing of the Counter Claim by NEISD against the Plaintiff appears to be additional retaliation for the Plaintiff opposing discrimination..

II. PRAYER

That Plaintiff/Counter-Defendant Annie L. Mzyk, *pro se*'s suit should not be dismissed and the suit should be allowed to proceed to trial.

Respectively submitted,

 *Annie L. Mzyk pro se*

Annie L. Mzyk, *pro se*

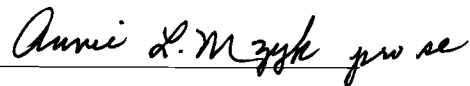
Plaintiff/Counter-Defendant

CERTIFICATE OF SERVICE

I do hereby certify that on March 27, 2015, the foregoing **Plaintiff's Answer to Defendant's Counter Claim Suit** has been served via Certified Mail Return Receipt Requested on Ricardo R. Lopez, Attorney for Defendant North East Independent School

District as follows: Ricardo R. Lopez
Attorney for NEISD
517 Soledad Street
San Antonio, Texas 78205

Respectively submitted,

 *Annie L. Mzyk pro se*

Annie L. Mzyk, *pro se*